

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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IN RE SALIX PHARMACEUTICALS, LTD. ) Case No. 14 Civ. 8925 (KMW)  
  ) CLASS ACTION  
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  )  
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**NOTICE OF LEAD PLAINTIFF'S UNOPPOSED MOTION FOR (I) PRELIMINARY APPROVAL OF SETTLEMENT, (II) CERTIFICATION OF THE SETTLEMENT CLASS, AND (III) APPROVAL OF NOTICE TO THE SETTLEMENT CLASS**

TO: All Counsel of Record

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement dated March 24, 2017 (the "Stipulation"), attached hereto as Exhibit 1; the accompanying memorandum of law; and all other papers and proceedings herein, Lead Plaintiff PWCM Master Fund Ltd., Pentwater Equity Opportunities Master Fund Ltd., Oceana Master Fund Ltd., Pentwater Merger Arbitrage Master Fund Ltd., and LMA SPC for and on behalf of the MAP98 Segregated Portfolio (collectively, "Lead Plaintiff") hereby moves this Court, under Rule 23 of the Federal Rules of Civil Procedure, for entry of an order: (i) preliminarily approving the proposed Settlement; (ii) certifying the proposed Settlement Class, certifying Lead Plaintiff and the City of Fort Lauderdale General Employees' Retirement System as class representatives, and appointing Lead Counsel as class counsel for purposes of the Settlement; (iii) approving the form and manner of giving notice of the proposed Settlement to Settlement Class Members; and (iv) scheduling a hearing to consider final approval of the Settlement and approval of the Plan of Allocation and Lead Counsel's motion for an award of attorneys' fees and reimbursement of Litigation Expenses.<sup>1</sup> Attached hereto as Exhibit 2 is the Parties' agreed-upon proposed Order

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<sup>1</sup> All capitalized terms used herein that are not otherwise defined herein have the meanings ascribed to them in the Stipulation.

Preliminarily Approving Settlement and Providing for Notice and its exhibits. Pursuant to the terms of the Stipulation, this motion is unopposed by Defendants.

Dated: March 24, 2017  
New York, NY

Respectfully submitted,

BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP

/s/ Salvatore J. Graziano

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